IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS **DALLAS DIVISION**

RONDELLTE FRAZIER, Individually and on behalf of all others similarly situated,

Plaintiff,

NO. 3:16-cv-02657-S

VS.

DALLAS/FORT WORTH INTERNATIONAL AIRPORT BOARD,

Defendant.

JOINT MOTION TO EXTEND MEDIATION DEADLINE

Plaintiff Rondellte Frazier ("Plaintiff") and Defendant Dallas/Fort Worth International Airport Board ("Defendant") hereby file this Joint Motion to Extend Mediation Deadline and would show the Court as follows:

- 1. The Parties' current deadline to complete mediation is June 12, 2018. [Doc. 117].
- 2. However, the Parties desire a productive mediation and agree that mediation will not be fruitful until third-party discovery related to the Plaintiff's and Opt-In Plaintiffs' hours worked for the Companies¹ is received.²
- 3. Plaintiff is preparing and will send subpoenas to the Companies and expects to receive the requested documents before the end of July.
 - 4 The Parties have scheduled mediation with Cecilia Morgan on August 10, 2018.
 - 5 This request is not sought for delay, but so that justice may be done.

The Parties, therefore, respectfully request the Court extend the deadline for mediation

¹ Wells Global, LLC ("Wells Global"), EAS Contracting, LP ("EAS"), Phillips/May Corporation ("Phillips"), Balfour Beatty Construction Corporation ("Balfour"), and the joint venture of Manhattan/Byrne/JRT/3i ("MBJ3"). ² Plaintiff argues that Defendant owes him and the Opt-In Plaintiffs overtime for hours worked for the Companies.

until August 24, 2018.

Respectfully submitted,

/s/Chris R. Miltenberger (w/permission)

Chris R. Miltenberger Texas State Bar No. 14171200

The Law Office of Chris R. Miltenberger, PLLC 1340 N. White Chapel Suite 100 Southlake, TX 76092-4322 817-416-5060 817-416-5062 (Fax) chris@crmlawpractice.com

ATTORNEY FOR PLAINTIFF

/s/ Saba H. Alvi

Kimberly R. Miers
Texas State Bar No. 24041482
kmiers@littler.com
Lauren B. Timmons
Texas State Bar No. 24093265
ltimmons@littler.com
Saba H. Alvi
Texas Bar No. 24082324
salvi@littler.com

LITTLER MENDELSON, P.C. A Professional Corporation 2001 Ross Avenue Suite 1500, Lock Box 116 Dallas, TX 75201.2931 214.880.8100 214.880.0181 (Fax)

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

On June 11, 2018, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, Dallas Division, using the Electronic Case Filing system of the Court. I hereby certify that I have served all counsel of record electronically as follows:

Chris R. Miltenberger
The Law Office of Chris R. Miltenberger, PLLC
1340 N. White Chapel
Suite 100
Southlake, TX 76092-4322

/s/ Saba H. Alvi Saba H. Alvi

Firmwide:155203323.1 086340.1002